

From: Patsy Hansel <phansel@mail.wrl.org>
To: ALA_DC_DMN.INET("iflanner@fcc.gov","mnadel@fcc.gov...
Date: 10/13/97 12:01pm
Subject: telecommunications discounts

Please, folks, do **not** make the application rules for discount rates so difficult.

Since I come from a relatively small, uncomplicated library system, our library would not suffer too much, but I fear for those library systems that have banded together to help bring smaller libraries into the technological age. To make rules so cumbersome that they inhibit the neediest of us all would be the cruelest sort of irony, and a slap in the face of those making serious efforts at streamlining government rules and regulations.

Take the time to make it simple now, and save us all, those writing the applications and those who have to evaluate them, time and aggravation in the long run.

Thank you very much for your attention.

CC: ALA_DC_DMN.ALA_DC_PO(ASJ)

From: Bob Harris <b-harris@dupagels.lib.il.us>
To: ALA_DC_DMN.ALA_DC_PO(ASJ)
Date: 10/13/97 12:56pm
Subject: Application forms

HELEN M. PLUM MEMORIAL LIBRARY
110 WEST MAPLE STREET
LOMBARD, ILLINOIS 60148
VOICE: (630) 627-0316
FAX: (630) 627-0336
E-MAIL: b-harris@dupagels.lib.il.us

MEMORANDUM

DATE: October 13, 1997
TO: Mark Nadel, Universal Service Branch, FCC
FROM: Bob Harris, Director
RE: Application Forms

I request that the proposed application forms for the universal service program be simplified to eliminate the system whereby we must allocate all services down to the level of individual libraries and schools. We feel that this will discourage libraries and schools from applying for these important discounts. Such a complex process will have the effect of discouraging aggregation.

Thank you for considering my request.

copy: Aleck Johnson, ALA Office for Information Technology Policy
automation\fcc1097

From: <HASLINKA@aol.com>
To: ALA_DC_DMN.ALA_DC_PO(ASJ)
Date: 10/13/97 1:01am
Subject: copied comments to FCC re: forms 470 & 471

Hello Mr. Johnson,

I sent the following message to Mark Nadel and Irene Flannery of the FCC as per ALAWON action alert of 10/11:

It is my understanding that a proposed change in the application forms for the Universal Service Program would require complex and burdensome documentation of all services down to the level of individual libraries and schools. Many of these institutions are organized into systems which share resources (especially electronic ones) and costs. The proposed change does not allow for this to be taken into account. It discourages cooperative efforts and has the potential to limit participation in the program by increasing the difficulty of the application process. Please allow these groups to calculate an area wide discount rate. Do not make changes in forms 470 and 471.

Thank You,
Linda Israelson
ALA member

From: "Dr. Larry Jess" <ljess@gilligan.esu7.k12.ne.us>
To: ALA_DC_DMN.ALA_DC_PO(ASJ)
Date: 10/13/97 2:24pm
Subject: Universal Service Applications & Rates

>Date: Mon, 13 Oct 1997 13:13:55 -0500

>To: mnadel@fcc.gov

>From: "Dr. Larry Jess" <ljess@gilligan.esu7.k12.ne.us>

>Subject: Universal Service Applications & Rates

>Cc: Iflanner@fcc.gov

>Bcc:

>X-Attachments:

>

>Mr. Nadel & Ms. Flannery:

>

>I am asking that the application forms for the universal service program
>not be so complicated that it will take a Philadelphia lawyer to complete.
>All we need is something simple that all can complete with some assurance
>that it is done right.

>We also need provisions where all libraries and schools, etc. can
>consolidate efforts to get the best possible rates. The communications
>firms are holding us up now. Their rates are way out of line.

>Sincerely

>

>

Larry Jess, Ph.D.
David City Public Schools
David City, Nebraska 68632

From: <Gjohnak@aol.com>
To: ALA_DC_DMN.INET("iflanner@fcc.gov")
Date: 10/13/97 5:13pm
Subject: Universal Service Fund

Ms. Flannery, I am writing to comment upon the proposed changes to the USF application procedure as outlined in the 10/10 meeting at the Federal Communications Commission. Specifically, I am writing about the change in language on Form 471, items 7 and 8, where the language changed from "Services ordered by more than one entity..." to "Services provided to more than one entity...". As I understand this, this makes the application process incredibly burdensome to a district like ours. I work for the Bering Strait School District, which is comprised of 15 schools spread over 80, square miles of the northwest coast of Alaska. As the Technology Coordinator, it is my responsibility to provide technological training and opportunities to our students and staff. The way I read the wording changes in the proposed application procedure, I'll be doing little but sitting in my office filling out forms. I would much rather complete one application for the entire district, for all services, and then get out into the schools to work with students and teachers and show them how to access all the educational possibilities of the Internet. That is how I envisioned the USF working for us, not me working for the USF. I really do not understand the purpose behind the proposed changes - making the application more arduous to fill out will only make it harder to process at the federal level as well: a huge bottleneck will build up and no one will get the services. The USF provides educational opportunities for our students and staff which we never thought possible in our remote location: I just hope the federal process doesn't get in the way of all the good the USF can do.

CC: ALA_DC_DMN.ALA_DC_PO(ASJ)

From: <pjohnson@cwmarssmail.cwmars.org>
To: ALA_DC_DMN.INET("mnadel@fcc.gov")
Date: 10/14/97 5:12am
Subject: TELECOM DISCOUNTS

Mr. Mark Nadel -

I urge the FCC to keep the applications for the telecommunications discounts uncomplicated. Most libraries with branches have centralized accounting offices, and budgets are overseen at one location. Applications for discounts should reflect this and not require separate applications for each location from which service is provided.

Thank you for your consideration.

Penelope B. Johnson
Head Librarian, Worcester (MA) Public Library
3 Salem Square, Worcester, MA 01608

CC: ALA_DC_DMN.ALA_DC_PO(ASJ)

From: <pjohnson@cwmarssmail.cwmars.org>
To: ALA_DC_DMN.INET("iflanner@fcc.gov")
Date: 10/14/97 5:17am
Subject: TELECOM DISCOUNTS

Ms. Irene Flannery -

I write to urge the FCC to consider the impact of complex applications for the telecommunications discounts. Library systems with multiple service points, e.g. branch libraries, usually have centralized accounting. To require separate applications for each location imposes a burden that will mean many libraries will be unable to comply - thus negating the purpose of the legislation that was aimed at helping bring technology to the poorest libraries

and schools. Please consider the spirit of this legislation when implementing the requirements.

Thank you.

Penelope B. Johnson
Head Librarian
Worcester Public Library
3 Salem Square
Worcester, MA 01608

CC: ALA_DC_DMN.ALA_DC_PO(ASJ)

From: Lori Keenan <lkeenan@norby.latah.lib.id.us>
To: ALA_DC_DMN.ALA_DC_PO(ASJ)
Date: 10/10/97 6:33pm
Subject: Universal Service Application Form

>To: iflanner@fcc.gov,mnadel@fcc.gov
>From: lkeenan@norby.latah.lib.id.us (Lori Keenan)
>Subject: Universal Service Application Form
>
>Dear Ms. Flannery, Mr. Nadel:
>
>On behalf of all of us at the Latah County Library District, I urge members
of the FCC to keep the application form for universal service as simple as
possible. We are a small 7 library system serving a very rural population
in one of the poorer states in the nation. If this service is to truly
benefit a population which needs help developing its educational and
economic opportunities, we need to remove as many roadblocks as possible to
make this happen. Please work in the spirit of this great new law and help
us as much as possible to achieve its benefit.
>
>Sincerely,
>Lori Keenan, Director
>Latah County Library District
>
>
>

Lori Keenan, Director
Latah County Library District
110 S. Jefferson Street
Moscow, ID 83843
tel: (208)882-3923
fax: (208) 882-5098
e-mail: lkeenan@norby.latah.lib.id.us

Even if you're on the right track, you'd better not sit still or else you'll
get run over.

-- Will Rogers

From: Kidd Gary <GKidd@lps.k12.co.us>
To: ALA_DC_DMN.INET("iflanner@fcc.gov","mnadel@fcc.gov...
Date: 10/14/97 9:59am
Subject: USF application

I am writing to express my displeasure at the decision which requires school districts to apply for discounts on a building by building basis. This format is not only burdensome on those of us generating the application on behalf of large school districts with multiple LANS, it mandates an inefficient means of calculating our costs through our systems. Our district is like most others in suburban areas, we maintain multiple LANS with the district head end at a central location. To disaggregate services which will be installed on a WAN for district-wide implementation is a waste of our time and resources. While I am taking it on faith that you have valid reasons for asking for aggregated data, I would hope that representatives of our government would have enough faith and trust in us that we will make the most effective and efficient uses of our resources on behalf of our clients. I attended a regional meeting in Breckenridge, Colorado, recently, where we expressed our point of view to DOE representatives that given the scope of our existing networks, multiple applications in a network environment is redundant. Please reconsider your views.

CC: ALA_DC_DMN.ALA_DC_PO(ASJ)

From: Marsha Korobkin <mkorobki@mail.sdcs.k12.ca.us>
To: Irene Flannery <iflanner@fcc.gov>, Mark Nadel <mn...
Date: 10/13/97 5:08pm
Subject: Changes to App. Forms 470 & 471 for Universal Service

Although in this country libraries as institutions have the most potential for educating the populace, it always amazes me that funding for libraries can be so elusive. It further amazes me that when the federal government attempts to provide certain services to libraries, often roadblocks appear mysteriously in the forms of convoluted processes and administrivia that all but prevent the end-user from accessing the service.

The October 10 proposed changes the wording in Universal Service Program Forms 470 and 471 Sections 7 & 8 would require the provision of individual statistics rather than aggregate statistics regardless of how the administrative entities are allocating costs. This would place an undue burden on school districts or library systems, particularly large systems to the point that the systems may discouraged from even applying for the funding. In fact, the individual statistics may not even be available in the format desired and may not be readily obtainable in a timely manner. If decisionmakers wish to make funding available for improving libraries, the application process ought to be easier rather than more difficult. I urge you not to make the changes to these forms suggested on Oct. 10. Thank you very much for your consideration.

Marsha Korobkin
Program Manager, Instructional Media Services
San Diego City Schools
2441 Cardinal Lane
San Diego, CA 92123
voice: (619) 496-8443
fax: (619) 496-8108
email: mkorobki@sandi.net or mkorobk1@san.rr.com

CC: Alec Johnson <asj@alawash.org>

From: "Lawless, Beth" <LawlesB@mail.santarosa.k12.fl.us>
To: "'mnadel@fcc.gov'" <mnadel@fcc.gov>
Date: 10/14/97 8:55am
Subject: FCC e-rate forms

Dear Mr. Nadel:

As we have lived the anticipation of the e-rate Universal Fund forms for several months now, we have all had fear in our hearts as to what these forms will require. As educators, we are in the business of educating children. We work very hard to accomplish this task and to accomplish it well. Our administrators and Media Specialists are not communication technical experts. The "projected forms" that I have seen are certainly massive and extremely time consuming.

If the federal government wants to help schools with connectivity and communications --- PLEASE strive to make this an easier process. Our educators do not have the time, nor the technical expertise, to satisfactorily complete the information requested on the forms. The forms are very cumbersome and confusing. A county-level application that would allow for one application and a reduced number of entries for services requested would certainly aid in this process. The burden of massive paperwork attached to this program obviates many who would otherwise apply.

Your serious consideration of reconsidering the burden of paperwork required will be greatly appreciated.

Sincerely,
Beth Lawless
Director, Instructional Technology (Library Media Services)
Santa Rosa County Schools
Milton, Florida 32570

CC: "'asj@alawash.org'" <asj@alawash.org>

From: "Robert W. Ling Jr." <rling@edcen.ehhs.cmich.edu>
To: ALA_DC_DMN.INET("iflanner@fcc.gov", "mnadel@fcc.gov...
Date: 10/13/97 3:59pm
Subject: Forms 470-471

Dear FCC Representatives:

It has been brought to my attention that yet more changes have been proposed to the forms 470 and 471 for Universal Service Fund applications. As the Technology Coordinator for the Delta-Schoolcraft Intermediate School District I will be fileing these forms in consortium with nine other school districts. I'm begging you to make these forms easier NOT more difficult. It appears that you are considering a change in wording which will make it more cumbersome for consortiums to apply and result in multiple entries on the 471 in items 7 and 8 when a service is being provided for all of my schools. The burden for filling out these forms was last set at 3 hours each, which was already a bit on the shallow side, now it will exponentiate. Please help us. We understand that you need information to make sound decisions, but there must be a better way.

CC: ALA_DC_DMN.ALA_DC_PO(ASJ)

From: <BarbLips@aol.com>
To: ALA_DC_DMN.INET("iflanner@fcc.gov","mnadel@fcc.gov...
Date: 10/13/97 7:11pm
Subject: FCC forms

I am writing to express my displeasure at the new forms that will be required to apply for the technology grants to schools and public libraries. Making each school apply separately will severely impede the budgetary process for many school districts, including my own, where this was planned to be handled at the district level. This year's funds have already been allocated to each school and there is certainly no provision made for each school to apply individually. I hope that the powers that be will rescind this decision and make it possible for schools to expedite the paperwork instead of encumbering its processing.

Sincerely,
Barbara Lipovics
Media Specialist
Beverly Shores Elementary School
Leesburg, FL 34748
BarbLips@aol.com

CC: ALA_DC_DMN.ALA_DC_PO(ASJ)

From: "Lewis Lucas" <lucasl@mail.dekalb.public.lib.ga.us>
To: ALA_DC_DMN.INET("mnadel@fcc.gov")
Date: 10/13/97 6:04am
Subject: Proposed changes to form 471

Dear Mr. Nadel,

Our library system consists of 24 separate locations operating in two school districts. The proposed changes which would require us to complete separate forms for each of these locations will tax and already badly understaffed system. We are trying to support all these locations with only one microsystems specialist, a network manager, a systems analyst and myself. We urge you to give more consideration to the administrative overhead these changes will impose on public libraries, which like other public services are being asked to do more with less every year.

Sincerely,
Lewis Lucas

Lewis Lucas
DeKalb County Public Library System
404-508-7190
lucasl@mail.dekalb.public.lib.ga.us

CC: Aleck Johnson <asj@alawash.org>

From: "Lyn L. MacEachron" <llmac@tln.lib.mi.us>
To: mnadel <mnadel@fcc.gov>
Date: 10/14/97 8:55am
Subject: Universal Service Application

Mark,

As the only full time employee at my library and the only professional librarian I must protest the burdensome changes being made in the Universal Services discount application. I do the library purchasing and scheduling. I must also be here when everyone else is sick or on vacations.

Small, poorer libraries are most in need of these discounts and one avenue of obtaining them is through our memberships in consortiums and co-operatives. The way these requirements are being rewritten seems to punish small, poorer libraries for being small and poor.

If the goal is to broaden services this seems an unusual way to reach that goal.

Thank you for your time.

Lyn L. MacEachron, Director
Lyon Township Public Library
New Hudson MI

CC: ALA_DC_DMN.ALA_DC_PO(ASJ)

Following was sent to Mark Nadel and Irene Flannery

Dear Mr. Nadel:

In a nutshell, the application forms need to be simplified as much as possible.

If the poor, technologically unsophisticated rural libraries in Arizona are to benefit from Universal Service they need to have application forms that are understandable and easy to fill out. The forms should be targeted to the libraries that are not very sophisticated. i.e., the libraries this program should help.

During the Friday, October 10, 1997 meeting at the FCC on the proposed application forms for the universal service program, changes in the forms were proposed that would dramatically increase the level of burden faced by Arizona libraries. The proposed forms outline a system where libraries would be required to allocate all services down to the level of individual libraries and calculate discounts for those services, irrespective of how the libraries are already allocating costs. This proposal has the potential to reduce participation among the poorest and most rural Arizona libraries. It has been our belief and understanding all along that this program was supposed to encourage and assist these poorer, rural libraries.

These proposed changes will actively discourage aggregation (which is perhaps the single most effective way of lowering costs for libraries), and will in fact , discourage libraries from applying for the discount program

The application form needs to be simplified and not designed to discourage applicants.

Thanks,

Robert Machinski

Robert C. Machinski, Director

Library Extension Division

1100 West Washington Avenue, Phoenix, Az. 85007

Tel: 602-542-5841 In State 800-255-5841

Fax: 602-256-6372 Email rmachin@dlapr.lib.az.us

URL:

<http://www.dlapr.lib.az.us>

From: "Bill Manson MVLC (978) 475-7632" <manson@mvlc.lib.ma.us>
To: ALA_DC_DMN.INET("IFLANNERY@FCC.GOV", "MNADEL@FCC.GO...
Date: 10/14/97 8:20am
Subject: Proposed changes in Universal Service Discount forms

I am writing to comment on the proposed changes to Forms 470 and 471.

I manage a network of 29 public libraries and I am deeply concerned that the proposed changes will further complicate the process of obtaining Universal Service discounts. Libraries and schools are relying on these discounts to enable them to add and upgrade their datalines and equipment for graphical Internet access. The proposed changes will delay projects that are in the planning phase and nearing implementation. The danger also exists that by complicating the process some eligible schools and libraries may not apply.

As the Executive Director of the Merrimack Valley Library Consortium, I am personally concerned with the proposed changes that will require me to make multiple filings for contracts that cover the entire network. I urge you to simplify the filing process rather than make it more complicated.

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*****
* Bill Manson                               * "Technology is      *
* Executive Director                       * impossible to      *
* Merrimack Valley Library Consortium      * predict, but      *
* Andover, MA 01810                       * stupidity is a    *
* Phone: (978) 475-7632                    * known constant." *
* Fax: (978) 475-8158                      *                  *
* Email: manson@mvlc.lib.ma.us             * -- Scott Adams    *
*****
```

CC: ALA_DC_DMN.ALA_DC_PO(ASJ), ALA_DC_DMN.INET("NETADMI...

From: "Marquardt, Steve" <MarquarS@mg.sdstate.edu>
To: ALA_DC_DMN.INET("mnadel@fcc.gov", "iflanner@fcc.gov...
Date: 10/13/97 11:14am
Subject: Universal service application process

October 13, 1997

Mark Nadel and Irene Flannery
Universal Service Branch
Federal Communications Commission
Washington, DC

Subject: SERIOUS PROBLEMS DEALING WITH AGGREGATION RAISED AT FCC MEETING ON
PROPOSED APPLICATION FORMS.

Dear Mr. Nadel and Ms. Flannery:

I write to urge you to simplify the proposed process to be used by public and school libraries to apply for universal service discounts.

During a Friday, October 10 meeting at the FCC on the proposed application forms for the universal service program, changes in the forms were proposed that would dramatically increase the level of burden faced by libraries and schools in filling out the application forms. The proposed forms outline a system wherein libraries and schools would be required to allocate all services down to the level of individual libraries and schools and calculate discounts for those services, irrespective of how library and school administrative entities are already allocating costs. This burden has the potential to limit participation among the poorest and most rural schools and libraries. The application process should not be this complex.

On Friday, October 10, a meeting was held at the Federal Communications Commission to discuss the draft forms that the FCC released on. During the meeting changes were made that will dramatically increase the level of burden faced by libraries and schools in filling out the application forms.

Commission staffers verified that these changes were receiving serious consideration. The most troubling changes were made on Form 471, where applicants list the services for which they wish to receive universal service support, several key wording changes were made. Specifically, items #7 and #8, which had been labeled "Services ordered by more than one entity (e.g. file server used by entire school district) (not location specific)" and "Services ordered by individual school or library (location specific)" were altered to read "Services PROVIDED TO more than one entity" and "Services PROVIDED TO individual school or library".

The net effect of this change is to force applicants to apply individual library's and school's discounts to the vast majority of services, rather than allowing library systems and school districts to calculate an "area wide" discount rate. For EVERY service ordered for EVERY location, the applicant will be required to apply an individualized discount rate. Applicants also will be required to provide extensive information on the contract for each branch -- even if the same contract serves multiple branches.

For instance, for a library system with three branches ordering a leased line and internet services, the library system would be required to enter 6 sets of information (one for internet and one for the leased line for each location). The larger the system, the greater the burden; a consortium with 15 libraries would be required to make at least 30 separate entries. Each entry would require a calculation of the discount percentage, a listing of the number of patrons served, the name of the service provider, individual information on the contract signed (including the contract number, award date, and expiration date), and cost forecasts for onetime, monthly, and/or annual costs.

The more services a consortium, library system, or district wishes to purchase, the greater the burden. Needless to say, this functions as a strong disincentive to aggregation. Furthermore, this move sets the stage for requiring all consortia, library systems and school districts to "allocate out" all of their shared services (such as internet connections) according to an as-yet unformulated cost allocation scheme. Such a scheme would undoubtedly undermine currently existing cost allocation mechanisms for library consortia which, in many cases, effectively subsidize poor and rural libraries by treating all line costs as shared.

The process of application should be greatly simplified.

Thank you for your attention to this important matter.

Sincerely,

Steve Marquardt, Ph.D.
Dean of Libraries
Briggs Library, Box 2115
South Dakota State University
Brookings, SD 57007-1098
Voice: 605-688-5106
FAX: 605-688-6133
Home: 605-697-6169
Internet: MarquarS@mg.sdstate.edu

c: Aleck Johnson, American Library Association - Washington Office.

CC: ALA_DC_DMN.ALA_DC_PO(ASJ)

From: McKenna, Jerry <mck04@co.henrico.va.us>
To: ALA_DC_DMN.INET("iflanner@ff.gov")
Date: 10/13/97 1:46pm
Subject: Universal Service Application Process

Dear Ms Flannery: At your recent FCC meeting on October 10, changes were proposed to the application process that would unnecessarily complicate this process.

As I understand it, the proposed changes would require libraries to allocate all services down to the level of the individual libraries and then calculate the discounts for these services at that level -- irregardless of how the administrative entity allocate these costs.

For an eleven (11) branch system, the proposed application process would require the County of Henrico Public Library is apply for every service ordered for every location -- even if one contract services all these locations. This proposal will place on undue burden on for library systems will multiple locations and is a strong disincentive for aggregation.

I urge you to reconsider this recent development and consider other less burdensome alternatives to the application process.

--

Gerald McKenna, mck04@co.henrico.va.us
Director, County of Henrico Public Library
Ph. 804-222-1643 Fax 804-222-5566

CC: ALA_DC_DMN.ALA_DC_PO(ASJ)

From: <zanhaus01450526@juno.com>
To: ALA_DC_DMN.INET("iflanner@fcc.gov","mnadel@fcc.gov...
Date: 10/14/97 12:50am
Subject: PROPOSED APPLICATION FORMS

TO: Mark Nadel
Irene Flannery

Late this afternoon I learned of the pending changes proposed for the application forms of the universal service program, and quite frankly was surprised. In this day of simplification and downsizing, it would seem natural to make this process, or for that matter any governmental process, less bureaucratic.

I beg you to reconsider the proposal and look to make the process easier for the thousands of libraries and schools who desperately are in need of Internet connection assistance. The calculation process, as proposed, would be extremely burdensome, not only to our rural libraries in Texas, but also, those in urban areas.

Thank you for your timely consideration to this plea.

Sincerely,
Jan Moltzan
Chair-elect, Friends and Trustees
Texas Library Association

CC: ALA_DC_DMN.ALA_DC_PO(ASJ),ALA_DC_DMN.INET("marks@t...

From: "Michael C. Mullin" <mmullin@sdln.net>
To: "'mnadel@fcc.gov'" <mnadel@fcc.gov>, "'iflanner@fc...
Date: 10/13/97 1:00pm
Subject: Universal Service Form 471

Changing the wording on items #7 and #8 of Form 471 to read "provide to" will have a negative impact on library service in South Dakota. I encourage you to change the wording back to "services ordered."

Some history is necessary to understand my reason for asking for this change. Most of the library service in South Dakota is provided through the statewide library network, a consortium funded by membership fees. The network has been providing multiple services, including Internet access, to the members for about ten years. There are over 40 full member libraries and around 150 dial access members. The membership includes all types of libraries from the small public/school library with one part-time librarian to the largest academic library in the state. In the decade that the network has existed the fee structure has been designed to provide support to the smaller libraries at the expense of the larger ones. This was done on purpose and with the consent of the larger libraries. We know that the only way to provide universal service to all the people in the state is for the more affluent communities to carry more of the costs. One of our goals is to have all libraries in the state connected to the network full-time with all library holdings listed in a statewide online catalog. All of this is being done with a staff of three people.

My reasoning is that this type of cooperation is a desirable thing that Congress wants to encourage. However, the change in wording to "provide to" will so increase the paperwork due to the number of members that the network will not be able to apply for the reduced rates nor will most of its current or future membership.

Michael C. Mullin
Director, Watertown Regional Library
Watertown, SD

605-882-6226
mmullin@sdln.net

CC: "'asj@alawash.org'" <asj@alawash.org>

From: George Needham <capnspalding@worldnet.att.net>
To: ALA_DC_DMN.INET("mnadel@fcc.gov")
Date: 10/13/97 6:34pm
Subject: USF Application Forms

Dear Mr. Nagel:

Please register my concern about the changes in the USF Form 471. I specifically refer to questions 7 and 8, which were altered to require schools and libraries to list services "provided to" rather than "ordered by" individual sites.

These apparently minor changes will discourage aggregation by making such aggregation more difficult, especially for smaller libraries and schools. The idea of being able to apply a school district's or a library system's discount across the service area was a key to simplifying the discount procedure. These changes nullify this goal.

Please reconsider this approach. Thank you.

George M. Needham
State Librarian
Library of Michigan
PO Box 30007
717 West Allegan Street
Lansing, Michigan 48909
(517) 373-7513 (voice)
(517) 373-4480 (fax)
gneedham@libofmich.lib.mi.us (office)
capnspalding@worldnet.att.net (home)

CC: ALA_DC_DMN.ALA_DC_PO(ASJ),ALA_DC_DMN.INET("iflanne...

From: Doris Nix <dnix@mcfls.org>
To: ALA_DC_DMN.INET("iflanner@fcc.gov","mnadel@fcc.gov...
Date: 10/13/97 1:25pm
Subject: UNIVERSAL DISCOUNT - FORMS

I wish to register opposition to the changes proposed for the FCC Universal Fund Discount Forms which would increase the burden of individualization of applications for each member of a consortium. I am the Director of the Milwaukee County Federated Library System (MCFLS). We have 15 distinct municipal units, with a total of 28 buildings. For many years our libraries have considered themselves to be ONE unit when it comes to automation and telecommunications services. The System (MCFLS) has always negotiated contracts and administered software, hardware, etc. to the benefit of all members.

To implement the proposed changes will drive a discordant wedge between members and pit one against the other, at the very time when cooperation and its attendant economies of scale are so important.

Please do not implement the changes. Allow and encourage consortia to be viewed as ONE whole.

Doris Nix
MCFLS Director
414-286-3210

CC: ALA_DC_DMN.ALA_DC_PO(ASJ)